

Eric H. Gibbs (State Bar No. 178658)
Amy M. Zeman (State Bar No. 273100)
GIBBS LAW GROUP LLP
505 14th Street, Suite 1110
Oakland, CA 94612
Tel: (510) 350-9700
Fax: (510) 350-9701
ehg@classlawgroup.com
amz@classlawgroup.com

Dena C. Sharp (State Bar No. 245869)
Adam E. Polk (State Bar No. 273000)
Nina R. Gliozzo (State Bar No. 333569)
GIRARD SHARP LLP
601 California Street, Suite 1400
San Francisco, CA 94108
Tel: (415) 981-4800
Fax: (415) 981-4846
dsharp@girardsharp.com
apolk@girardsharp.com

Counsel for Plaintiffs

[Additional Counsel on Signature Page]

Marc G. Cowden
Adam Stoddard
**SHEUERMAN, MARTINI, TABARI,
ZENERE & GARVIN**
A Professional Corporation
1033 Willow Street
San Jose, California 95125
(408) 288-9700
Fax: (408) 295-9900
mcowden@smtlaw.com
astoddard@smtlaw.com

John J. Duffy
Kevin M. Ringel
SWANSON, MARTIN & BELL, LLP
330 N Wabash, Suite 3300
Chicago, Illinois 60611
Tel: (312) 321-9100
Fax: (312) 321-0990
jduffy@smbtrials.com
kringel@smbtrials.com

Counsel for Defendant Chart Inc.

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE PACIFIC FERTILITY CENTER
LITIGATION

This Document Applies to:

No. 3:20-cv-05047 (A.J. and N.J.)
No. 3:20-cv-04978 (L.E. and L.F.)
No. 3:20-cv-05030 (M.C. and M.D.)
No. 3:20-cv-04996 (O.E.)
No. 3:20-cv-05041 (Y.C. and Y.D.)

Master Case No. 3:18-cv-01586-JSC

**JOINT STIPULATION AND
~~PROPOSED~~ ORDER REGARDING
TRIAL SCHEDULE**

WHEREAS, the Court held a case management conference on July 1, 2021 and rescheduled the November 8, 2021 trial to January 2022;

WHEREAS, the Court further ordered the parties to submit a stipulation modifying the existing schedule in accordance with the continued trial date;

NOW THEREFORE, the parties through their respective counsel and subject to the Court's approval, hereby stipulate that the following schedule will be implemented:

Event	Current Deadline	Proposed Deadline
Deadline to serve rebuttal expert reports	June 18, 2021	July 29, 2021
Expert Discovery Cut-Off	July 2, 2021	August 10, 2021
Deadline to file summary judgment and Daubert motions	July 16, 2021	August 24, 2021
Deadline to file oppositions to summary judgment and Daubert motions	August 20, 2021	September 23, 2021
Deadline to file replies to summary judgment and Daubert motions	September 3, 2021	October 14, 2021
Hearing on summary judgment and Daubert motions	September 23, 2021	November 4, 2021
Parties to serve, but not file, motions in limine and exchange proposed jury instructions	October 7, 2021	December 6, 2021
Parties to serve, but not file, oppositions to motions in limine	October 14, 2021	December 20, 2021
Deadline for Parties to meet and confer regarding motions in limine and proposed jury instructions	October 19, 2021	January 6, 2022
In lieu of preparing a Joint Pretrial Conference Statement, the parties shall meet and confer in person or via videoconference, and then prepare and file: (1) a jointly signed Proposed Final Pretrial Order; (2) a joint set of proposed instructions on substantive issues of law arranged in a logical sequence; (3) a separate memorandum of law in support of each party's disputed instructions; (4) proposed voir dire questions; (5) trial briefs on controlling issues of law; (6) proposed verdict forms; (7) objections to exhibits; and (8) a joint simplified Statement of the Case	October 21, 2021	January 13, 2022
Parties to file motions in limine and oppositions together, back-to-back, in properly identified separate memoranda	October 21, 2021	January 13, 2022

Pretrial Conference	October 28, 2021	January 20, 2022
Trial of First Additional Case	November 8, 2021	January 31, 2022

IT IS SO STIPULATED.

Dated: July 8, 2021

By: /s/ Adam E. Polk
 Dena C. Sharp (State Bar No. 245869)
 Adam E. Polk (State Bar No. 273000)
 Nina R. Gliozzo (State Bar No. 333569)
GIRARD SHARP LLP
 601 California Street, 14th Floor
 San Francisco, CA 94108
 Tel: (415) 981-4800
 Fax: (415) 981-4846
 dsharp@girardsharp.com
 apolk@girardsharp.com

By: /s/ Amy M. Zeman
 Eric H. Gibbs (State Bar No. 178658)
 Amy M. Zeman (State Bar No. 273100)
GIBBS LAW GROUP LLP
 505 14th Street, Suite 1110
 Oakland, CA 94612
 Tel: (510) 350-9700
 Fax: (510) 350-9701
 ehg@classlawgroup.com
 amz@classlawgroup.com

By: /s/ Adam B. Wolf
 Adam B. Wolf (State Bar No. 215914)
 Tracey B. Cowan (State Bar No. 250053)
**PEIFFER WOLF CARR & KANE, A
 PROFESSIONAL LAW
 CORPORATION**
 4 Embarcadero Center, Suite 1400
 San Francisco, CA 94111
 Tel: (415) 766-3545
 Fax: (415) 402-0058
 awolf@pwcklegal.com

Plaintiffs' Counsel

By: /s/ Kevin M. Ringel
 John J. Duffy (SB No. 6224834)
 Kevin M. Ringel (SB No. 6308106)
SWANSON, MARTIN & BELL, LLP
 330 N Wabash, Suite 3300
 Chicago, Illinois 60611
 Tel: (312) 321-9100
 Fax: (312) 321-0990
 jduffy@smbtrials.com

1 kringel@smbtrials.com

2 Marc G. Cowden (SB No. 169391)
3 Adam Stoddard (SB No. 272691)
4 **SHEUERMAN, MARTINI, TABARI,**
5 **ZENERE & GARVIN**
6 1033 Willow Street
7 San Jose, California 95125
8 Tel: (408) 288-9700
9 Fax: (408) 295-9900
10 mcowden@smtlaw.com
11 astoddard@smtlaw.com

12 *Counsel for Defendant Chart Inc.*

13
14 **IT IS SO ORDERED** that the foregoing Stipulation is approved.

15 Dated: July 8, 2021

